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April 25, 2025

## **VIA ECF**

The Honorable Robyn F. Tarnofsky  
United States Magistrate Judge  
500 Pearl Street  
New York, New York 10007

Re: *Abuladze, et al. v. Apple Commuter, Inc., et al.*  
Case No.: 1:22-cv-08684-GHW-RFT  
Our File No.: 20559.002

Dear Magistrate Judge Tarnofsky:

We represent the Plaintiffs in the above-referenced action. The Court's Order dated April 17, 2025, requires the parties to file a stipulation of dismissal by April 25, 2025 (See ECF 309). We write to the Court, on consent of the Hotel Defendants, to respectfully request a 30-day extension of such due date to May 26, 2025.

As the Court is aware, in November of 2024 the Plaintiffs and certain active Defendants in this matter, the Apple Commuter Defendants and the Hotel Defendants, agreed to a settlement in principle. On that basis in February of 2025, Plaintiffs withdrew their Motion to Certify Class. The reason for the requested adjournment is that the Hotel Defendants who intend to settle advise that they will need additional time to evaluate the impact and consequences of a settlement in a non-class action matter.

We thank the Court in advance for its consideration.

Respectfully submitted,

/s/ Vano Haroutunian

Vano I. Haroutunian, Esq. (VH1010)

*Counsel for Plaintiffs*

cc: All Counsel of Record (via ECF)